

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE ETHIOPIAN AIRLINES FLIGHT
ET 302 CRASH**

AURORA SZE MING CHEUNG and
CHEUK MING CHEUNG, as Administrators
of the Estate of VICTOR SHING NGAI
TSANG, deceased,

Plaintiff,

v.

THE BOEING COMPANY, a Delaware
corporation;
ROSEMOUNT AEROSPACE, INC., a
Delaware corporation;
ROCKWELL COLLINS, INC., a Delaware
corporation,

Defendants.

Lead Case No.: 19-cv-02170

**SHORT FORM COMPLAINT AND
NOTICE OF ADOPTION OF MASTER
COMPLAINT**

DEMAND FOR JURY TRIAL

PLAINTIFF(s), AURORA SZE MING CHEUNG and CHEUK MING CHEUNG, as Administrators of the Estate of VICTOR SHING NGAI TSANG, deceased, COMPLAINS OF THE DEFENDANTS AND EACH OF THEM AS FOLLOWS:

1. Plaintiff(s) refers to and incorporates herein by reference the Master Complaint, and any and all later amendments thereto, filed in IN RE ETHIOPIAN AIRLINES FLIGHT ET 302 CRASH, as though fully set forth herein. Plaintiff(s) hereby adopts the Master Complaint and agrees to be bound by any rulings with respect to the pleadings of the Master Complaint.

2. Plaintiff(s) adopt(s) each of the general allegations of the Master Complaint except for those paragraph numbers set forth here, if any: _____

CLAIMS AGAINST DEFENDANTS

3. Plaintiff brings those Counts, as applicable, against each of the Defendants in the Master Complaint checked below:

- ☒ THE BOEING COMPANY
- ☒ ROSEMOUNT AEROSPACE, INC.
- ☒ ROCKWELL COLLINS, INC.

4. Plaintiff incorporates by reference each of the Counts in the Master Complaint checked below:

As against THE BOEING COMPANY:

- ☒ Count One for Negligence
- ☒ Count Two for Breach of Warranty
- ☒ Count Three for Strict Liability
- ☒ Count Four for Failure to Warn

As against ROSEMOUNT AEROSPACE, INC.:

- ☒ Count Five for Negligence
- ☒ Count Six for Strict Liability
- ☒ Count Seven for Breach of Warranty

As against ROCKWELL COLLINS, INC.:

- ☒ Count Eight for Negligence
- ☒ Count Nine for Strict Liability
- ☒ Count Ten for Breach of Warranty

PLAINTIFF(S) INFORMATION:

4. Decedent, VICTOR SHING NGAI TSANG, is an individual who was killed in the crash of Ethiopian Airlines Flight ET 302 on March 10, 2019.

5. The following Plaintiffs are heirs, beneficiaries, and/or next of kin of Decedent, or other persons entitled to bring an action for the wrongful death of Decedent, and bring the causes of action alleged herein on behalf of all heirs and next of kin, including but not limited to: his wife Aurora Sze Ming Cheung, his son Oliver Xlin Tsang, and his daughter Selina Amani Yuelin Tsang.

6. Plaintiff(s) is a resident of a foreign nation. Plaintiff(s)' decedent is a resident of a foreign nation.

7. Decedent's Estate is represented in the following capacity:

- ☒ AURORA SZE MING CHEUNG and CHEUK MING CHEUNG are Administrators of the Estate of Decedent and are authorized to bring an action on behalf of the Decedent. Plaintiff was appointed in this capacity on July 19, 2019.
- ☐ Other (please describe):

_____.

PLAINTIFF(S) DAMAGES:

8. Plaintiff(s) requests the relief checked below:

All past and future general and compensatory damages in an amount according to proof at trial, including the following:

- ☒ For Decedent's conscious and physical pain and suffering, fright and terror, fear of impending and imminent death, mental anguish, and emotional distress, in an amount according to proof at trial.

- ☒ For past and future loss of support and services in money or in kind, in an amount according to proof at trial.
- ☒ For past and future loss of consortium, love, companionship, comfort, care, assistance, protection, affection, society, moral support, training, advice, tutelage, and guidance, in an amount according to proof at trial.
- ☒ For past and future grief, emotional distress, and sorrow, in an amount according to proof at trial.
- ☒ For funeral expenses, burial expenses, estate administration expenses, and other related expenses in an amount according to proof at trial.
- ☒ For expenses for the identification and/or transportation of Decedent's remains, according to proof at trial.
- ☒ For all property losses, in an amount according to proof at trial.
- ☒ For attorneys' fees, costs and other damages as permitted under applicable laws.
- ☒ For punitive and exemplary damages in an amount according to proof at trial;
- ☒ For pre- and post-judgment interest on all damages as allowed by the law.
- ☒ For all costs of suit incurred herein.
- ☒ For such other and further relief as the Court shall deem just and proper.
- ☐ Other (specify):

ADDITIONAL ALLEGATIONS, IF ANY

9.

DEMAND FOR JURY TRIAL

PLAINTIFF(S) hereby demand(s) a trial by jury as to all claims in this action.

Dated: December 18, 2019

s/ Robert A. Clifford

Robert A. Clifford (ARDC No. 0461849)
Kevin P. Durkin (ARDC No. 3127906)
Tracy A. Brammeier (ARDC No. 6317792)
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